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June 10, 2013

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## By Courier

Jean D. Jewell, Secretary Idaho Pubic Utilities Commission 472 W. Washington St. Boise, ID 83702

Re: Case No. IPC-E-13-14 IN THE MATTER OF THE CONTINUATION OF IDAHO POWER COMPANY'S A/C COOL CREDIT, IRRIGATION PEAK REWARDS, AND FLEXPEAK DEMAND RESPONSE PROGRAMS FOR 2014 AND BEYOND

Dear Ms. Jewell:

Enclosed for filing in the above matter are an original and seven (7) copies of EnerNOC's Petition to Intervene.

Thank you,

Teresa Hill

K&L Gates, LLP

Enclosure: Petition to Intervene

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UTILITIES COMMISSION

Attorney for EnerNOC, Inc.

Fax: (503) 248-9085

## **BEFORE THE**

## **IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF THE	)	
CONTINUATION OF IDAHO POWER	)	Case No. IPC-E-13-14
COMPANY'S A/C COOL CREDIT,	)	
IRRIGATION PEAK REWARDS, AND	)	PETITION TO INTERVENE
FLEXPEAK DEMAND RESPONSE	)	OF ENERNOC, INC.
PROGRAMS FOR 2014 AND BEYOND	)	
•	)	

ENERNOC INC. ("EnerNOC") hereby petitions the Commission for leave to intervene in the above titled proceeding pursuant to Rules 71 through 75 of the Commission's rule of Practice and Procedure, IDAPA 31.01.01.072-075 and the Notice of Informal Prehearing Conference. In support of this Petition, EnerNOC submits the following:

1. The name and address of EnerNOC, Inc. is:

Melanie Gillette Director, Regulatory Affairs EnerNOC, Inc. 115 Hazelmere Drive Folsom, CA 95630 Telephone: (916) 501-9573 Fax: (415) 227-1645 mgillette@enernoc.com 2. EnerNOC's representative for the purpose of service of pleadings and other written materials is:

Teresa A. Hill K&L Gates, LLP 222 Columbia St. Suite 1400 Portland, OR 97201 Telephone: (208) 850-7422

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3. EnerNOC is a leading developer and provider of clean and intelligent power solutions to commercial, institutional, and industrial customers, as well as electric power grid operators and utilities. EnerNOC's technology-enabled demand response and energy management solutions help optimize the balance of electric supply and demand. EnerNOC serves demand response customers throughout the Northeastern United States, as well as Arizona, Australia, California, Canada, Colorado, Florida, Idaho, New Mexico, New Zealand, Oregon, the Tennessee Valley, Texas, Utah and the United Kingdom. EnerNOC maintains 39 full time employees in its Boise, Idaho field office.

EnerNOC contracts with Idaho Power to manage the FlexPeak Management Program ("FlexPeak Program") pursuant to a February 23, 2009 Demand Response Agreement ("Agreement") (as amended pursuant to Orders 31098 and 32805), under which Idaho Power provides a voluntary demand response program for its large commercial and industrial customers. On May 9, 2013, the Commission issued Order No. 32805 implementing changes to the FlexPeak Program for the 2013 season. The Agreement expires in February 2014.

EnerNOC also provides program implementation services for the the Irrigation Peak

Reward Program ("Peak Reward Program"), which provides irrigation customers with a financial incentive for allowing Idaho Power to turn off their irrigation pumps during periods of high

system demand during summer months. This program was suspended for the 2013 season

pursuant to Order No. 32776.

Each of these programs serves Idaho Power customers in both Oregon and Idaho.

4. EnerNOC has a direct and substantial interest in this proceeding because EnerNOC manages the

FlexPeak Program and provides program implementation services for the Peak Rewards

Program, two of the three demand response programs being considered in this docket. The

outcome of this proceeding and the continuation or modification of Idaho Power's demand

response programs for 2014 and beyond will have a direct affect on EnerNOC's future contracts

in Idaho.

5. EnerNOC intends to monitor the proceedings as a party and, if necessary, raise issues that are

appropriate to the proceeding. No other party can adequately address EnerNOC's interests in

this proceeding.

WHEREFORE, EnerNOC respectfully requests that the Commission grant this petition to Intervene

and authorize EnerNOC to participate in the above-entitled proceeding with the full rights of a

formal party.

DATED this 10th day of June, 2013

K&L Gates, LLP

Teresa Hill

Attorney for EnerNOC, Inc.

Ta Del

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 10th day of June, 2013, a true and correct copy of the foregoing PETITION TO INTERVENE BY ENERNOC, Case No. IPC-E-13-14, was served by electronic mail and U.S. Mail, properly addressed with postage prepaid, to:

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By\_\_\_\_\_\_Teresa Hill